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June 29, 2022

Via ECF

The Honorable Colleen McMahon  
United States District Judge for the Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

Re: U.S. v. Allianz Global Investors U.S. LLC, 22 Cr. 00279 (CM)

Dear Judge McMahon:

We write on behalf of Defendant Allianz Global Investors U.S. LLC (“AGI US”) to request a six-month adjournment of (i) the November 17, 2022 control date for sentencing in the above-referenced matter, and (ii) any corresponding dates for submission of the Pre-Sentence Report by the Probation Office. There have been no previous requests for adjournments or extensions in this matter.

As a result of the corporate guilty plea by AGI US, AGI US and one of its affiliates have applied to the U.S. Department of Labor for waivers from disqualification from utilizing the Qualified Professional Asset Manager (“QPAM”) exemption under the Employee Retirement Income Security Act of 1974. Any QPAM waiver must be in place at the time of sentencing in order to prevent AGI US and its affiliate from being automatically disqualified from utilizing the QPAM exemption. The requested six-month extension would afford the Department of Labor additional time to consider and act on the pending applications.

The Government and the Probation Office do not oppose this request.

Respectfully submitted,



James M. McDonald

The Honorable Colleen McMahon

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Cc: Gina Castellano, Esq.  
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